



DAVID G. LAZARUS
PARTNER
dlazarus@verrill-law.com
(617) 292-2859

Verrill Dana LLP
50 Main Street, Suite 1000
White Plains, NY 10606
Main 617-309-2600

June 29, 2023

By ECF

The Honorable Hector Gonzalez
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Alexey Brayman, Docket No. 22-cr-00409-HG-6

Dear Judge Gonzalez:

Defendant Alexey Brayman and Vadim Yermolenko (collectively, the “Defendants”) are currently scheduled for a status hearing on July 27, 2023. Defendant Alexey Brayman writes to respectfully request a continuance to the week of July 31, 2023. Absent a continuance, Mr. Brayman and Mr. Yermolenko are presently scheduled to appear before this Court on July 27, 2023. Neither Defendant Vadim Yermolenko nor the United States Attorney’s Office for the Eastern District of New York object to this request.

The undersigned is scheduled to be out of the office the week of July 26, 2023 and it will be challenging to appear in Brooklyn on July 27, 2023. The undersigned will appear on July 27, 2023 if the Court elects to deny this request.

The parties have collaborated on a Protective Order, which is nearly agreed-upon, a stipulation of the parties regarding draft translations, and the government has indicated it plans to provide discovery once the Protective Order is agreed-upon and entered by this Court.

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In addition, I have conferred with both the government and counsel for Mr. Yermolenko and the parties jointly request that this time be excluded under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7). The parties agree that the ends of justice served by granting the proposed continuance outweigh the best interests of the public and Messrs. Brayman and Yermolenko in a speedy trial.

WHEREFORE, the Defendant Alexey Brayman, without objection, respectfully requests the Court continue the July 27, 2023 hearing to the week of July 31, 2023, or to a time convenient for the Court and that the Court exclude the time under the Speedy Trial Act. A proposed order is filed herewith.

Dated: June 29, 2023

Respectfully submitted,

s/ David G. Lazarus

David G. Lazarus

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cc: Clerk of Court (by ECF)
Assistant United States Attorney Artie McConnell (by ECF)
Assistant Federal Defenders Nora Hirozawa & Earl Kirkland (by ECF)